

Federal Defenders
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Southern District
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April 29, 2020

BY ECF

The Honorable William H. Pauley III
United States District Court Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street Courtroom 20B
New York, New York 10007

Re: *United States v. Derrilyn Needham*, 06cr0911-WHP-2

Dear Judge Pauley:

We write to respond to the government's April 28, 2020 letter, which states that "testing is not necessary because there was no indication of exposure" As set forth in Ms. Needham's April 24, 2020 letter, Ms. Needham was exposed to a lieutenant who ordinarily works on the women's unit, Lieutenant Somerville, who has recently been out sick. Ms. Needham understands from other unit staff that he has tested positive for COVID-19. Ms. Needham informed Ms. Duncan of this exposure, though the clinical encounter notes do not reflect this information. Thus, Ms. Needham maintains that she was potentially exposed to somebody who has tested positive for COVID-19.

For her own health and safety, and that of the other inmates on the open dormitory, as well as the staff on her unit, we continue to request that the Court order that she be brought to the hospital immediately for testing. Alternatively, Ms. Needham requests that the Court schedule a conference and order that she be permitted to participate at that conference via telephone from MDC.

Respectfully submitted,

/s Jason I. Ser
Jason I. Ser
Assistant Federal Defender
David Stern
Counsel for Ms. Needham

cc: Rebecca Dell, A.U.S.A. (by email)